

Ernest Cory (*Admitted Pro Hac Vice*)
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Lead Counsel for Plaintiffs

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
(SAN FRANCISCO DIVISION)**

IN RE: VIAGRA (SILDENAFIL CITRATE)
AND CIALIS (TADALAFIL) PRODUCTS
LIABILITY LITIGATION

Master File No.: 3:16-md-02691-RS

MDL No.: 2691

This Document Relates to: ALL ACTIONS

**DECLARATION OF ERNEST CORY IN
SUPPORT OF ADMINISTRATIVE
MOTION TO FILE UNDER SEAL**

[CIVIL LOCAL RULES 7-11, 79-5]

I, Ernest Cory, make this Declaration under penalty of perjury in support of Notice of Administrative Motion to File Under Seal and submit the following information:

1. I am Lead Counsel for plaintiffs in this matter and know the following facts of my own personal knowledge and, if called to testify thereto, I could and would competently do so.
2. Plaintiffs' Motion to Exclude Certain of Defense Experts' Opinions quotes portions of three documents which have each been designated by Defendants as "Confidential" or "Highly Confidential" under the Amended Stipulated Protective Order entered in this case (Doc. 471) and thus those portions were redacted for the public docket. The confidential documents are also included as Exhibits PX 13, PX 14, and PX 15 to that motion.

3. PX 13 was designated as “Highly Confidential” by Defendant Pfizer and was labeled by Pfizer as PFI02795741.

4. PX 14 was designated as “Confidential” by Defendant Eli Lilly and was labeled by Eli Lilly as LLY01487173.

5. PX 15 was designated as “Confidential” by Defendant Eli Lilly and was labeled by Eli Lilly as LLY01722023.

I declare under penalty of perjury and the laws of the United States and the State of California that the above statements are true and that this Declaration was executed on January 11, 2019, at Birmingham, Alabama.

Dated: January 11, 2019.

CORY WATSON, P.C


Ernest Cory (*Admitted Pro Hac Vice*)
CORY WATSON P.C.

Lead Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I, Rachel Abrams, hereby certify that on this 11th day of January 2019, I electronically filed the foregoing with the Court using the CM/ECF system and thereby delivered by electronic means to all registered participants as identified on the Notice of Electronic Filing.

/s/ Rachel Abrams

Rachel Abrams